REMARKS

I.   Summary of the Office Action and this Reply

Claims 1-24 and 28-35 are pending in the application. The Examiner has

rejected claims 1-7 under 35 U.S.C. § 103(a), asserting that such claims are

unpatentable over U.S. Patent No. 6,230,196 to Guenthner et al. ("Guenthner") in

view of U.S. Patent No. 6,085,199 to Rose ("Rose"). The Examiner has rejected

claims 8-10 under § 103(a), asserting unpatentability over Guenthner in view of

Rose and further in view of Airth, "Navigation in Pop-up Menus." Claims 11-14

stand rejected under § 103(a) as unpatentable over Guenthner in view of Rose and

Airth, and further in view of U.S. Patent No. 5,706,502 to Foley et al. ("Foley").

Claims 15-24 and 28-35 stand rejected under § 103(a) as unpatentable over

Guenthner in view of Rose and Foley.

Claims 1, 2, 5-9, 11-14, 17, 21, 28-30 and 33-35 have been amended.

II.   Response to 103 Rejections

In paragraphs 5-8 of the Action, the Examiner rejected claims 1-24 and 28-35

under 35 U.S.C § 103(a).

The Present Invention

The present invention provides a computer-implemented method and

apparatus for providing a logical point of access to multiple files. The single logical

point of access is referred to as a "multilink," which appears in a web page displayed by a web browser in the form of a traditional hyperlink. Application, page 6, line 24- page 7, line 1. A traditional hyperlink is associated with a <u>single electronic address</u> (e.g. URL) of a particular linked file. The association is between: (1) the hyperlink displayed by the browser; and (2) the electronic address that is <u>in the parent/source</u> <u>file</u> (e.g. in the HTML coding) that is <u>resident at the client</u> and interpreted by the client's web browser to display the web page (including the hyperlink) at the client computer, etc, as known in the art. See application, page 2, lines 3-13.

In contrast, a multilink is associated with a <u>plurality of electronic addresses</u> of the particular linked file(s) (e.g. URLs). <u>The plurality of electronic addresses are</u> <u>included in the parent/source file</u> (e.g. in the HTML coding) that is <u>resident at the</u> <u>client</u> and interpreted by the client's web browser to display the web page including the multilink at the client computer, etc.

The plurality of addresses are preferably concatenated within a single multilink URL ("mURL") associated with the multilink and <u>included in the</u> <u>parent/source file resident at the client</u>. Application, page 3, line 24 - page 4, line 9; page 6, lines 11 - page 7, line 1. For example, the mURL appears in an HTML source file, and the multilink is displayed as a hyperlink by a web browser interpreting the source file. See Figure 2B; page 9, lines 6-21.

The selection of a multilink (e.g. by a user's mouse click) results in display of a menu showing all of the hyperlinks/files/options accessible via the multilink. More

specifically, selection of the multilink results in parsing the mURL to identify the individual URLs associated with the multilink, and displaying of the menu with options corresponding to the individual URLs. The menu is preferably displayed as a pop-up menu, which no more than partially obscures the web page containing the corresponding multilink. A user may then select a particular hyperlink from the menu to request/retrieve the desired file from the associated URL. Application, page 4, lines 9-19; page 10, lines 23-26; Figure 2B. In this manner, web page "clutter" resulting from numerous hyperlinks is reduced.

U.S. Patent No. 6,230,196 to Guenthner

Guenthner discloses a method for dynamically creating a Web page at a Web server in response to an HTTP request from a Web client. The Web page has a hypertext reference identifying a linked page, etc. that may be supported on multiple distinct servers. In response to the HTTP request, a given one of the distinct servers is identified/selected based on given criteria. Electronic address information identifying a path to the selected server is then inserted into the hypertext reference of the Web page. The Web page, including the inserted electronic address, is then returned to the client in response to the request. Thus, if the hyperlink is later activated by the user browsing the returned Web page, the linked page is served from the selected other server using the inserted electronic address. Col. 2, lines 9-23.

U.S. Patent No. 6,085,199 to Rose

Rose discloses a method for distributing a file in a plurality of different file formats. More specifically, Rose discloses displaying a web page in which multiple hyperlinks are presented. See Rose, Figure 3. Each hyperlink is associated with a single file in a certain format. In accordance with the teachings of Rose, not all of the files listed via the hyperlinks are actually stored on the server. Rather some files for which hyperlinks are displayed may be created on an "as needed" basis, thereby reducing the number of files that would otherwise be needed to be stored on the server. Rose, col. 4, lines 40-67.

U.S. Patent No. 5,706,502 to Foley

Foley discloses an Internet-enabled portfolio manager system and method for portfolios of software projects that are distributed over a set of networked computers. Foley discloses a browser employed by the system to download selected remote portfolio files from the Internet. The downloading occurs as those selected portfolio files are needed by various portfolio methods as they process portfolios. Foley, col. 2, line 44 - col. 3, line 3.

Airth document

This document describes a study investigating where a pop-up menu should appear relative to the mouse pointer's position when the pop-up menu appears.

Argument

A Section 103 rejection is proper only if all claim limitations are taught or suggested by the prior art, MPEP §2143.03. Moreover, even if all elements are found in the cited art, there must still be motivation in the cited art to make the proposed combination.

Claims 1-7

Guenthner teaches creating a web page "on the fly" to include an "up-to-date" electronic address in a web page source file for displaying a hyperlink. According to Guenthner, the **one** best electronic address for a file at the time of the HTTP request from a client is identified/selected and inserted in the source file before the source file is transmitted to the client in response to the request. Col. 2, lines 14-21; col. 2, lines 49-53; col. 4, lines 41-52; col. 6, line 65 - col. 7, line 1; col. 4, lines 15-24. This is performed at the server 44 by a generator 45. Figure 3; col. 4, line 66- col. 5, line 5. Accordingly, at the client, the web page source file is like any conventional Web page source file in that it contains a single conventional electronic address associated with a single conventional hyperlink. This does not serve to reduce clutter in web pages by reducing the number of links by providing a multilink that is a logical point of access to a plurality of files; instead, it causes clutter by causing a distinct hyperlink to be displayed for each linked file. According to Guenthner, the web page source file never contains more than one electronic address that is associated with a single hyperlink, as in the present invention.

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In the present invention, the multilink (displayable by a web browser) is a single hyperlink that is associated with a plurality of electronic addresses in a source file (interpretable by the web browser to display the multilink). It is these electronic addresses (and the corresponding files) that are accessible via the single multilink. The web page source file is therefore resident at the client when the multilink is displayed and the file includes multiple electronic addresses that are associated with the multilink-type hyperlink. This reduces clutter in a web page by allowing access to these files via the single multilink, rather than via a hyperlink for each electronic address. Claim 1 has been amended to clearly recite this relationship.

Rose teaches presenting a web page displaying <u>multiple hyperlinks</u> for a <u>single file</u> stored on a web server, and creating files "on the fly" to provide information in various formats, etc. This causes a greater number of hyperlinks to be displayed via web pages relative to the number of files stored on a web server. This results in web pages excessively populated with hyperlinks, i.e. "cluttered" web pages, and is contrary to the present invention, which teaches presenting a web page displaying a <u>single hyperlink (namely, the multilink)</u>, for <u>multiple files</u> stored on a web server. Compare Figures 2A and 2B; page 9, lines 23-26.

Neither Guenthner nor Rose provide any teaching or suggestion of a <u>multilink</u>, as defined in the application, which has a one-to-many relationship to files and <u>is associated with a plurality of electronic addresses for those files in a web page source file that is interpretable, e.g. by a web browser, to display the multilink as a hyperlink</u> (claim 1, "each of the plurality of files having a respective unique electronic address associated with the multilink in a file interpretable to display the multilink.")

Accordingly, multiple addresses corresponding to a single multilink appear in the source file interpretable by a browser to display the multilink.

For at least these reasons, reconsideration and withdrawal of the rejection of independent claim 1, and dependent claims 2-7 is respectfully requested.

Additionally, claim 5 requires that the multilink be associated with a <u>multilink URL</u> in the web page source file that comprises <u>multiple</u> concatenated electronic addresses. Application, page 7, lines 10-17; and page 9, lines 3-21. A multilink URL is neither taught nor suggested by Guenthner nor Rose. Claim 6 further requires <u>parsing of the plurality of electronic addresses of a single multilink URL</u>, which is neither taught nor suggested by Guenthner or Rose.

For at least these additional reasons, reconsideration and withdrawal of the rejection of dependent claims 5, 6 and 8 is respectfully requested.

Claims 8-10

Claims 8-10 depend from claim 1 and are believed patentable for at least the reasons set forth above for claim 1.

In addition, claim 8 requires a <u>pop-up menu of options that no more than partially obscures a web page containing the multilink</u>, which contributes to the reduction of cluttered web pages. See Figure 2B; page 10, lines 23-26. This is neither taught nor suggested by Rose. Rather, Rose discloses display of an additional/different web page. See Rose, Figure 3; Examiner's admission at page 12, lines 4-6. Displaying a web page having multiple links (as Rose does) is not in keeping with the present invention, which reduces the clutter of multiple links on web

pages by displaying a web page with a single multilink to multiple files, URLs, and a relatively small menu with individual menu options.

With respect to the Examiner's rejection of claims 9 and 10, it is emphasized that the web page of Rose containing multiple hyperlinks is not analogous to the menu of the present invention. Rose's "directory" function to cause display of multiple hyperlinks for a single native file is performed before display of the web page, or as part of the initial display of the web page. In contrast, the claimed invention requires generation and display of a menu of options after selection of a multilink, and therefore after the initial display of the web page containing the multilink, and displaying such a menu superimposed over such a web page.

Neither Guenthner, Rose nor Airth teach or suggest the claimed invention. For at least these additional reasons, reconsideration and withdrawal of the rejection of claims 8-10 is respectfully requested.

Claims 11-14

Claims 11-14 depend from claim 1 and are believed patentable for at least the reasons set forth above for claim 1.

With respect to claims 11-14, neither Guenthner, Rose, Airth, nor Foley teach or suggest a multilink URL, as discussed above with reference to claim 5, or any steps involving transmitting a file containing a multilink URL, as required by claims 11-14. A multilink URL (mURL) is a concatenation of individual electronic addresses (URLs) associated with the multilink. Application, page 3, line 24 - page 4, line 9; page 6, lines 11 - page 7, line 1. For at least these additional reasons,

reconsideration and withdrawal of the rejection of claims 11-14 is respectfully requested.

Claims 15-24

Claims 15 and 16 depend from claim 1 and are believed patentable for at least the reasons set forth above for claim 1.

Independent apparatus claims 17 and 21 have been amended similarly to amended method claim 1, to require a first computer program stored in the memory for displaying, at the client, a multilink as a hyperlink, the multilink providing a logical point of access to a plurality of files, each of the plurality of files having a respective unique electronic address associated with the multilink in a file interpretable to display the multilink. Neither Guenthner, Rose nor Foley provide any disclosure whatsoever of such a multilink, as set forth in part above for claim 1.

Additionally, claims 17 and 21 require a second computer program stored in the memory for generating a menu of user-selectable options responsive to a user's selection of a multilink to a plurality of files. This is neither taught nor suggested by Guenthner, Rose or Foley, as discussed above. A menu of options is not a multilink. Furthermore, Rose's web page displaying multiple hyperlinks for a single native file stored on the server is neither a menu of options nor a multilink, as discussed above.

Claims 18-20 depend from claim 17 and claims 22-24 depends from claim 21. For at least these reasons, reconsideration and withdrawal of the rejection of claims 17-24 is respectfully requested.

Claims 28-32

Independent apparatus claims 28 and 30 require a <u>multilink URL</u>, and are therefore believed patentable for reasons similar to those set forth above for claim 5. Additionally, claims 28 and 30 require a computer program for <u>parsing a multilink URL comprising a plurality of electronic addresses</u> to generate a menu of user-selectable options <u>responsive to a user's selection of a multilink, each of the options corresponding to a respective one of the plurality of electronic addresses</u>. Furthermore, claims 28 and 30 have been amended to require that the multilink URL is associated with the multilink, which means that the multilink URL includes a plurality of electronic addresses that are present in a file interpretable, e.g. by a web browser, for displaying a web page including the multilink, as discussed above with reference to claim 1.

A multilink, selection of a multilink, a multilink URL including multiple electronic addresses, parsing of a multilink URL to identify the individual electronic addresses associated with the multilink, and generating of a menu of options, each of which corresponds to an electronic address of the multilink URL, are neither taught nor suggested by Guenthner, Rose or Foley.

For at least these reasons, reconsideration and withdrawal of the rejection of claims 28-32 is respectfully requested.

Claims 33-35

Claims 33-35 are believed patentable for similar reasons set forth above for claims 1-16. Additionally, independent claim 33 has been amended to expressly

require displaying a menu of options superimposed <u>to no more than partially</u>

<u>obscure the web page in which the multilink is displayed</u>, responsive to a user's

selection of the multilink (see Figure 2B). This is neither taught nor suggested by

Guenthner, Rose or Foley. Rose merely teaches display of a web page having

multiple hyperlinks corresponding to a single file stored on a server. (See discussion

above of claim 8).

Claims 34 and 35 require a <u>multilink URL</u> and <u>parsing of the multilink URL</u>,

respectively, neither of which is taught or suggested by Guenthner, Rose or Foley,

as discussed above.

For at least these reasons, reconsideration and withdrawal of the rejection of

claims 33-35 is respectfully requested.

CONCLUSION

In view of the foregoing amendments and remarks, Applicants believe claims

1-24 and 28-35 to be patentable and the application in condition for allowance.

Applicants respectfully request issuance of a Notice of Allowance. If any issues

remain, the undersigned request a telephone interview prior to the issuance of an

action.

Respectfully submitted,

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